

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	CA No.: 7:20-cv-00947
	)	
COLLINS MURPHY , SHARON	)	
HAMMONDS, BRENDA F. WATKINS,	)	
LIMESTONE UNIVERSITY , MG	)	
FREESITES, LTD., d/b/a PORNHUB.COM,	)	
MG FREESITES II LTD., MINDGEEK	)	
S.A.R.L., MINDGEEK USA, INC., MG	)	
BILLING LTD., and HAMMY MEDIA LTD.	)	
d/b/a XHAMSTER.COM, TRAFFICSTARS	)	
LTD., WISEBITS LTD, XHAMSTER IP	)	
HOLDINGS LTD, WISEBITS IP LTD.,	)	
	)	
Defendants.	)	
<hr/>		
JANE DOE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CA No.: 7:21-cv-03193
	)	
LIMESTONE UNIVERSITY F/K/A	)	
LIMESTONE COLLEGE, COLLINS	)	
MURPHY, MG FREESITES, LTD., d/b/a	)	
PORNHUB.COM, and HAMMY MEDIA,	)	
LTD. d/b/a XHAMSTER.COM,	)	
	)	
Defendants.	)	

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO COMPEL DISCOVERY**  
**AGAINST DEFENDANTS HAMMY MEDIA LTD d/b/a XHAMSTER.COM,**  
**TRAFFICSTARS LTD. and WISEBITS IP LTD.**

Pursuant to Fed. R. Civ. Pro. 26 and 37, the above-captioned Plaintiffs move the Court for an Order compelling the Defendants to produce full and complete responses to:(1) Plaintiffs' First

Set of Interrogatories to Defendant HammyMedia, Ltd.; (2) Plaintiffs' Second Set of Requests for Production to Defendant HammyMedia; (3) Plaintiffs' First Set of Interrogatories to Defendant Trafficstars, Ltd; (4) Plaintiffs' Second Set of Requests for Production to Defendant TrafficStars Ltd.

Prior to filing this Motion the Plaintiff has attempted in good faith to confer and resolve these matters with Counsel for the Defendants. Specifically, the parties had several meet and confers on the discovery requests raised in this Motion, with the most recent meet and confer being held on February 9, 2024. Further, the Plaintiff altered the Court of these discovery disputes and requested permission to file a Motion during the February 21, 2024 Status Conference.

For the reasons stated herein, the remaining discovery items remain in dispute and are now ripe for the Court to address. The Plaintiffs respectfully request an. der compelling the Defendants to provide full and complete responses to: (1) Plaintiffs' First Set of Interrogatories to Defendant Trafficstars, Ltd., (2) Plaintiffs' First Set of Interrogatories to Defendant HammyMedia, Ltd., (3) Plaintiffs' Second Set of Requests for Production to Defendant HammyMedia, and (4) Plaintiffs' Second Set of Requests for Production to Defendant TrafficStars Ltd within 30 days of the Court's Order granting this Motion.

**[SIGNATURE BLOCK ON FOLLOWING PAGE]**

Respectfully submitted,

**BELL LEGAL GROUP, LLC**

s/J. Edward Bell, III

J. Edward Bell, III (1280)  
Gabrielle A. Sulpizio (12715)  
Joshua M. W. Salley (13214)  
219 North Ridge Street  
Georgetown, SC 29440  
TEL.: (843) 546-2408  
FAX: (843) 546-9604  
[ebell@edbelllaw.com](mailto:ebell@edbelllaw.com)

**DOLT, THOMPSON, SHEPHERD &  
CONWAY, PSC**

Tyler S. Thompson (admitted Pro Hac Vice)  
Liz J. Shepherd (admitted Pro Hac Vice)  
Chad Propost (admitted Pro Hac Vice)  
13800 Lake Point Circle  
Louisville, KY 40223  
Telephone: (502) 244-7772  
[tthompson@kytrial.com](mailto:tthompson@kytrial.com)  
[lshepherd@kytrial.com](mailto:lshepherd@kytrial.com)  
[cpropost@kytrial.com](mailto:cpropost@kytrial.com)

**NATIONAL CENTER ON SEXUAL  
EXPLOITATION**

Benjamin Bull (admitted Pro Hac Vice)  
Danielle Bianculli Pinter (admitted Pro Hac Vice)  
Christen Price (admitted Pro Hac Vice)  
Peter Gentala (admitted Pro Hac Vice)  
1201 F Street NW  
Washington, D.C. 20004  
[bbull@ncose.com](mailto:bbull@ncose.com)  
[dpinter@ncoselaw.org](mailto:dpinter@ncoselaw.org)  
[cprice@ncoselaw.org](mailto:cprice@ncoselaw.org)  
[pgentala@ncoselaw.org](mailto:pgentala@ncoselaw.org)

**ATTORNEYS FOR PLAINTIFF**

March 13, 2024  
Georgetown, SC